

IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

2007 NOV 19 P 5:08

NATHANIEL WILLIAMS,  
Plaintiff,

v.

FOLEY PIPE PRODUCTION COMPANY,  
BOB SAPONE, and STEVE VICK,  
Defendant.

\*

\* CLERK

\* DISTRICT COURT

\* Case Number: 2:07-cv-963

\*

\*

\*

\*

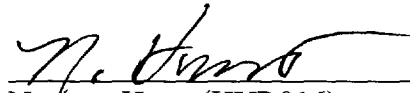
\*

PLAINTIFF'S MOTION FOR AN ENLARGEMENT OF TIME

COMES NOW, the Plaintiff, Nathaniel Williams by and through his undersigned attorney and according to the rules of procedures and humbly prays for an extension of time to file a reply brief to a Motion to Dismiss filed by the Defendants, Steve Vick, Bob Sapone, and says as follows:

1. That Plaintiff's counsel is need of an enlargement of time, of 15 days, up to and including December 11, 2007 from the date of November 26, 2007 which is the date presently Ordered by the Court to file a responsive brief to the above party Defendants' Motion to Dismiss.
2. That Plaintiff's counsel has a final hearing in the Montgomery County Circuit Court, in a matter styled The Avon Group LLC, v. The City of Montgomery, et al., Case Number: CV-2007-1162-PR, set for November 26, 2007, which was filed prior to this matter.
3. That Plaintiff's counsel has been inundated with hearings this month in state court and is need of further time to adequately reply to the defendants' brief to dismiss.
4. That the same has spoken with the Honorable Steven Stastny, Defendants' counsel, concerning this matter and he has no objection at this time to an enlargement for 15 days, in order that Plaintiff may respond to said dismissals, so long as he may have up to and including December 21, 2007 to reply to the same.

WHEREFORE, PREMISES, CONSIDERED the same humbly prays for an extension of 15 days yo to and including December 11, 2007 to reply to the Defendants' Motion to Dismiss and the Defendants be allowed until December 21, 2007 to reply to the same.

  
Norman Hurst (HUR016)  
Attorney for the Plaintiff  
617 Martha Street  
Montgomery, Alabama 36104  
(334) 269-6449

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing motion was served on the following by mailing copies of same by United States First Class Mail in a properly addressed envelope with adequate postage affixed thereon to assure delivery, addressed as follows:

Steven Stastny, Esq  
Ford & Harrison LLP  
2100 3<sup>rd</sup> Avenue North, Suite 400  
Birmingham, Alabama 35203

This 19<sup>th</sup> day of November, 2007.

  
Norman Hurst